

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

DEERFIELD BEACH NON-)	
UNIFORMED MUNICIPAL)	
EMPLOYEES RETIREMENT PLAN,)	Civil Case No. 3:05-cv-1430-HL
Individually and On Behalf of All Others)	
Similarly Situated,)	
)	
)	
Plaintiff,)	
v.)	
)	
DORAL FINANCIAL CORP.,)	
SALOMON LEVIS, ZOILA LEVIS,)	
RICARDO MELENDEZ, RICHARD F.)	
BONINI, and EDGAR M. CULLMAN,)	
)	
)	
Defendants.)	
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CARLOS GARCIA FLORES, On Behalf)	
of Himself and All Others Similarly)	Civil Case No. 3:05-CV-1464-CCC
Situated,)	
)	
)	
Plaintiff,)	
)	
v.)	
)	
DORAL FINANCIAL CORP.,)	
SALOMON LEVIS, RICARDO)	
MELENDEZ, EDGAR M. CULLMAN,)	
JR., ZOILA LEVIS, MARIO S. LEVIS,)	
and PRICEWATERHOUSECOOPERS,)	
LLP,)	
)	
Defendants.)	

**MOVANTS THE 1199 SEIU HEALTH CARE EMPLOYEES PENSION
FUND AND ROBERT I. FOX'S NOTICE OF MOTION FOR
CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFFS,
LEAD COUNSEL AND LOCAL COUNSEL**

PLEASE TAKE NOTICE that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), the 1199SEIU Health Care Employees Pension Fund, Activest Investmentgesellschaft mbH and Robert I. Fox (“Movants”) will move this Court, at a time and place to be determined, for an Order:

- (1) consolidating the following related actions filed on behalf of the purchasers of the securities of Doral Financial Corp. (“Doral”):

<u>Case Name</u>	<u>Case No.</u>
<i>Deerfield Beach Non-Uniformed Municipal Employees Retirement Plan v. Doral Financial Corp., et al.</i>	3:05-cv-1430-HL
<i>Flores v. Doral Financial Corp., et al.</i>	3:05-cv-1464-CCC

- (2) appointing Movants as Lead Plaintiffs in the above related actions pursuant to Section 21(D)(a)(3)(B) of the PSLRA; and

- (3) approving Movants’ selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and De Jesus Hey & Vargas as Local Counsel.

This motion is supported by the accompanying memorandum of law in support of the motion, the [proposed] order granting the motion, the affidavit of Richard A. Speirs in support of the motion and the exhibits attached thereto, all of the prior pleadings and proceedings had

herein, and such other written and/or oral argument as may be presented to the Court.

Dated: San Juan, Puerto Rico
June 20, 2005

Respectfully submitted,

DE JESUS HEY & VARGAS

/s/ Charles S. Hey-Maestre

Charles S. Hey-Maestre (USDC-PR No. 201906)
1060 Calle Borinquen
Condominio Santa Rita C-8
Río Piedras, PR 00925
Tel. (787) 758-8950
Fax: (787) 758-8911

Peter Berkowitz, Esq. (USDC-PR No. 201110)
PO Box 191471
San Juan, Puerto Rico 00919-1471
Tel. (787) 758-8950
Fax: (787) 758-8911

Local Counsel for Movants

**ZWERLING, SCHACHTER
& ZWERLING, LLP**

Jeffrey C. Zwerling
Richard A. Speirs
Joseph Lipofsky
Sona R. Shah
41 Madison Avenue
New York, NY 10010
Tel: (212) 223-3900
Fax: (212) 371-5969

**ZWERLING, SCHACHTER
& ZWERLING, LLP**

Kevin M. McGee
595 South Federal Highway,
Suite 600
Boca Raton, FL 33432
Tel: (561) 544-2500
Fax: (561) 544-2501

HANZMAN & CRIDEN, P.A.

Michael E. Criden
220 Alhambra Circle
Suite 400
Coral Gables, FL 33134
Tel: (305) 357-9000
Fax: (305) 357-9050

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Douglas M. McKeige
Gerald H. Silk
1285 Avenue of the Americas, 38th Floor
New York, NY 10019
Tel: (212) 554-1400
Fax: (212) 554-1444
Attorneys for
Activest Investmentgesellschaft mbH

Attorneys for Movants

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